

Hearing Date and Time: December 13, 2019 at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: December 6, 2019 at 4:00 p.m. (prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears

**NOTICE OF MOTION FOR AN ORDER ESTABLISHING
STREAMLINED PROCEDURES GOVERNING ADVERSARY
PROCEEDINGS BROUGHT BY THE DEBTORS PURSUANT TO SECTIONS
502, 547, 548 AND 550 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE that Sears Holdings Corporation and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**” or “**Plaintiff**”), has filed the attached motion (the “Motion”) for entry of the order attached as Exhibit B to the Motion (the “Proposed Order”) establishing procedures governing adversary proceedings commenced pursuant to 11 U.S.C. §§ 502, 547, 548, and 550.

PLEASE TAKE NOTICE that a hearing to consider the Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge for the United States Bankruptcy Court for the Southern District of New York, at 300 Quarropas Street, White Plains, New York 10601, Courtroom 118, on **December 13, 2019 at 10:00 a.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that responses or oppositions, if any, to the relief requested in the Motion, must be in writing, must comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, must describe the basis for the response or opposition and the specific grounds therefor, and must be filed with the Bankruptcy Court electronically and served, so as to be actually received no later **December 6, 2019 at 4:00 p.m. (prevailing Eastern Time)** (the “Opposition Deadline”), on (a) counsel to

Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

the Debtors, ASK LLP, 2600 Eagan Woods Drive, Suite 400, St. Paul, Minnesota (Attn: Brigitte McGrath, Esq.), Katten Muchin Rosenman LLP 575 Madison Avenue, New York, New York 10022 (Attn: Steven J. Reisman) and (b) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York 10014. A courtesy copy of such written response or objection must also be delivered to the Bankruptcy Judge's chambers prior to the hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that if no oppositions or other responses to the Motion are timely filed and served, the Creditor Trustee shall submit to the Bankruptcy Court an Order substantially in the form attached as Exhibit B to the Motion, which the Bankruptcy Court may enter with no further notice or opportunity to be heard.

Dated: November 15, 2019

ASK LLP

By: /s/ Brigitte G. McGrath

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